

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES  
PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION**

**MDL NO. 16-2738 (MAS) (RLS)**

***THIS DOCUMENT RELATES TO ALL CASES***

**PROPOSED ORDER EXCLUDING THE TESTIMONY OF  
DEFENDANTS' EXPERTS DRs. MICHAEL FINAN, CHERYL SAENZ,  
AND KEVIN HOLCOMB**

**THIS MATTER**, having been opened to the Court by Plaintiffs for entry of an order excluding the testimony of Defendants' experts Drs. Michael Finan, Cheryl Saenz, and Kevin Holcomb and the Court having considered the submissions of the parties and having heard oral argument, and for good cause shown;

**IT IS** on this \_\_\_\_\_ day of \_\_\_\_\_, 2024

**ORDERED** as follows:

1. Plaintiffs' Motion to Exclude the Testimony of Defendants' Experts Drs. Michael Finan, Cheryl Saenz, and Kevin Holcomb is Granted in its entirety; and

2. Drs. Michael Finan, Cheryl Saenz, and Kevin Holcomb, experts for Defendants, shall be barred from offering general causation opinions and testifying about general causation.

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Hon. Michael A. Shipp